COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
Valley Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

Columbia Gas Transmission Corporation
Bickers Compressor Station – Green County, Virginia
Permit No. VRO-40083

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Columbia Gas Transmission Corporation has applied for a renewal of its Title V Operating Permit for its Bickers Compressor Station facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Engineer/Permit Contact:_____ Date: 11/14/07

Air Permit Manager:_____ Date :11/14/07

Deputy Regional Director:_____ Date: 11/15/07

.

FACILITY INFORMATION

Permittee
Columbia Gas Transmission Corporation
1700 MacCorkle Ave. S.E.
Charleston, West Virginia 25325-1273

Facility
Bickers Compressor Station
2567 Celt Road
Stanardsville, Virginia 22973

County-Plant Identification Number: 51-079-0006

SOURCE DESCRIPTION

NAICS Code: NAICS 486210 – Natural Gas Transmission

The Bickers Compressor Station (BCS) is a natural gas transmission facility. Natural gas (NG) is received via pipelines from an upstream compression station, is compressed, and is pumped into outlet pipelines for transmission downstream. The BCS utilizes four (4) natural gas-fired stationary reciprocating internal combustion (IC) engines, each nominally rated at 3,200 horsepower (Hp) to drive the natural gas compressors. Auxiliary equipment at the facility includes one natural gas–fired boiler rated at 2.1 MMBtu/hr heat input, one natural gas pipeline heater rated at 4.0 MMBtu/hr, one natural gas fired generator rated at 82 Hp, one natural gas-fired generator nominally rated at 375 Hp, and numerous insignificant activities.

The facility is a Title V major source of nitrogen dioxide, carbon monoxide, and formaldehyde emissions. This source is located in an attainment area for all pollutants, and is a PSD major source. The facility operates under two NSR Permits issued on 5/25/90, and 4/29/97. The facility has an exemption to operate a basement water evaporator system which vents through the compressor engine exhaust stacks.

COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, has been conducted on 9/5/06. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

CHANGES TO EXISTING TITLE V PERMIT

Since the original Columbia Gas' Title V permit, the following changes were made to the draft renewal Title V permit:

- *General Conditions:* The "General Conditions" section of the Title V permit has been updated to reflect changes made to the Title V boilerplate since Columbia Gas' permit was issued.

- *Condition III.B.5:* The condition was revised to reflect that monitoring has begun and is a continuation of the monitoring. The initial six month period has occurred and does not need to be repeated.

- *40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engine:* Subpart ZZZZ has been promulgated since the current permit issuance. Language stating that the units are subject has been included in the Title V renewal permit.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
00201	E01	Cooper Bessemer GMWH-8V-275 (Constructed 1990)	31.8 MMBtu/hr, 3,200 horsepower nominal, 3,710 horsepower during periods of low ambient temperature	--	--	--	05/25/90
00202	E02	Cooper Bessemer GMWH-8V-275 (Constructed 1990)	31.8 MMBtu/hr, 3,200 horsepower nominal, 3,710 horsepower during periods of low ambient temperature	--	--	--	05/25/90
00203	E03	Cooper Bessemer GMWH-8V-275 (Constructed 1990)	31.8 MMBtu/hr, 3,200 horsepower nominal, 3,710 horsepower during periods of low ambient temperature	--	--	--	05/25/90
00204	E04	Cooper Bessemer GMWH-8V-275 (Constructed 1997)	31.8 MMBtu/hr, 3,200 horsepower nominal, 3,712 horsepower during periods of low ambient temperature	--	--	--	04/29/97
002G1	G1	Waukesha VGF-18GL natural gas fired Auxiliary Generator (constructed 1990)	375 horsepower nominal; 412.5 horsepower maximum short-term rating.	--	--	--	04/29/97

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

EMISSIONS INVENTORY

A copy of the 2006 annual emission update is attached. Emissions are summarized in the following tables.

2006 Actual Emissions

Emission Unit	2006 Criteria Pollutant Emission in Tons/Year				
	VOC	CO	SO_2	PM_{10}	NO_x
00201	3.37	11.09	0.02	0.76	11.17
00202	3.78	12.42	0.02	0.85	12.51
00203	5.29	17.42	0.02	1.19	17.54
00204	13.83	27.72	0.04	1.89	17.28
002G1	0.00	0.03	0.00	0.00	0.02
Total	**26.27**	**68.68**	**0.1**	**4.69**	**58.52**

2006 Facility Hazardous Air Pollutant Emissions

Pollutant	2006 Hazardous Air Pollutant Emission in Tons/Yr
Formaldehyde	6.74

EMISSION UNIT APPLICABLE REQUIREMENTS - Internal Combustion Compressor Engine Requirements (Emission Units 00201, 00202, 00203, and 00204)

Limitations

The following limitations are requirements from the Minor NSR Permit issued on May 25, 1990:

Specific Condition 4, limits horsepower rating for the compressor engines (00201, 00202, and 00203) and limits the maximum NO_x emission rate.

Specific Condition 5, limits operating hours for compressor engines (00201, 00202, and 00203).

Specific Condition 6, limits emissions from compressor engines (00201, 00202, and 00203) in grams per brake horsepower hour, pounds per hour, and tons per year.

Specific Condition 7, limits visible emissions from compressor engines (00201, 00202, and 00203).

Specific Condition 9, allows natural gas to be burned in the three compressor engines (00201, 00202, and 00203).

The following limitations are requirements from the Minor NSR Permit issued on April 29, 1997:

Condition 3, requires NOx, CO, and VOC emissions from the fourth Cooper Bessemer GMWH-8V-275C2 compressor engine (Emission Unit 00204) to be controlled through proper operation and maintenance of the engine, installation of clean burn pre-combustion chamber technology, installation of a turbocharger, and installation of an air cooler shall be used to control engine emissions. Condition 3 also limits annual average NO_x emission rate.

Condition 4, limits horsepower rating for the compressor engine (00204) and limits the maximum NO_x emission rate.

Condition 5, allows natural gas to be burned in the compressor engine (00204).

Condition 8, limits operating hours for the compressor engine (00204).

Condition 10, limits emissions from the compressor engine (00204).

Condition 12, limits visible emissions from the compressor engine (00204).

Condition 20, requires a maintenance schedule and maintenance records to be maintained.

Emission Units 00201, 00202, 00203, and 00204 are subject to 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. Although these units are subject by definition, no specific requirements apply. Therefore, only language stating that the units are subject has been included in the permit.

Monitoring and Recordkeeping

The permit includes provisions for maintaining records of all required emission data and operating parameters necessary to demonstrate compliance. These records include: the scheduled and unscheduled maintenance on the engines, and periodic NOx, O_2, and CO measurements. Additionally, the permittee must maintain written operating procedures for the engines and must train all operators on the proper operation of the equipment.

Compliance with the emission limits established for NO_x, CO and VOC is achieved by proper operation and maintenance of the engines, and by abiding by the annual limitations on work produced by each engine (bhp-hr). The permit requires the permittee to develop an inspection and maintenance schedule for the engines and to maintain records of all scheduled and non-scheduled maintenance. The permit also requires all operators to be trained on the proper operation of the process. Records of the training shall be maintained.

The permit requires periodic testing to be performed on the exhaust stream of each engine. The testing is required to be conducted on each engine once a year. The testing will be conducted using procedures approved by the DEQ; these procedures will not necessarily entail use of EPA reference methods. The purpose of the testing is to provide a reasonable assurance of compliance with emission limits. The testing will likely involve use of portable gas analyzers to measure the NO_x, CO, and diluent O_2 concentrations in the exhaust of each engine. Carbon monoxide monitoring will serve as a surrogate method for monitoring VOC emissions generated by the engines. When incomplete combustion of fuel occurs, both CO and VOC concentrations will increase in the exhaust products of combustion units.

The periodic testing will serve several purposes. First, the testing will be used to demonstrate that proper operation and maintenance of the engines achieve compliance with the established permit limits for NO_x, CO, and VOC. Additionally, the periodic testing for CO will provide a measure of the engine operation and combustion efficiency. Second, the measurements will be used to confirm the emission factors which will be employed to demonstrate compliance with annual permit limits.

If the periodic monitoring indicates an exceedance of an emission standard, the permittee is required to take corrective action to correct any equipment which is not operating properly. If corrective action does not eliminate the emissions exceedance, the permittee is required to conduct an EPA reference method test or other test method approved by the DEQ for the pollutant that exceeds the standard. The reference method test will be used to determine the compliance status of the engine(s) with respect to the emission standard and short term (hourly)

emission limit. It is worth noting that an exceedance of an emission standard which is measured using a portable gas analyzer may be considered credible evidence of a violation, however, it does not necessarily establish or correspond to a violation of the permit.

Pollutant-specific emission factors will be used to calculate annual emissions on a monthly basis for each engine. Emission rates will be calculated using the results of a 1991 40 CFR 60, Appendix A stack test on compressor engine Emission Unit 00201 and a 1998 40 CFR 60, Appendix A stack test on compressor engine Emission Unit 00204. (See Appendix D)

The use of these emission factors provides a reasonable assurance of compliance with emission limitations and underscores that the operational and work (bhp-hr) produced limitations are the controlling parameters limiting emissions from the engines. The periodic measurement of NOx and CO emissions will serve as a check on the continued representativeness of the emission factors derived from stack tests.

Annual emissions from the operation of each engine will be calculated on a monthly basis using the following equation:

$$E_i = EF_{i,j} \; x \; C \; x \; O \; x \; \frac{1}{453.593}$$

where:

E_i = Emissions of pollutant i, in lbs/time period

$EF_{I, j = 1, 2, 3}$ = DEQ approved emission factors for emissions of pollutant i from engine j (Emission Unit 00201, 00202, and 00203) measured in grams/brake-horsepower-hours (g/bhp-hr). The $EF_{i,j}$ value is derived from the results of a 1991 emissions compliance test for Emission Unit 00201. See Appendix D, Table 6-1 for a copy of the test results.

- 1 .49 g/hp-hr for NOx
- 0.918 g/hp-hr for CO
- 0.285 g/hp-hr for NMHC (VOC)

$EF_{NOx, j = 4}$	=	DEQ Approved Emission Factor for emissions of NOx from engine j (Emission Unit 00204) measured in grams/brake-horsepower-hours (g/bhp-hr). The $EF_{NOx, j}$ value is derived from the stack test results of a 1998 emissions test of Emission Unit 00204. See Appendix D for a copy of the test results.
		• 0.84 g/hp-hr for NOx
C	=	Capacity rating of engine, in horsepower (hp).
O	=	Operating hours for the time period.
453.593	=	conversion factor, grams per pound

Although the DEQ or EPA may request the engine emission units be tested for compliance purposes at any time, the periodic monitoring required by the draft Title V permit also specifies when stack testing for compliance purposes may be conducted. Condition III.B.6 states if corrective action has been performed on the engine emission unit and the portable emission monitor continues to show an exceedance of the emission standard (g/bhp-hr), then a compliance test shall be conducted on the engine in accordance with condition III.B.6.c. The compliance test shall be conducted in accordance with test methods outlined in 40 CFR 60, Appendix A or a DEQ approved test method. The compliance test results may be used to revise the emission factors ($EF_{i,j}$) used to calculate annual NO_x, CO and VOC emission limits. The new emission factor must be DEQ approved.

9 VAC 5-80-110E.2 requires periodic monitoring to yield reliable data from the relevant time period that is representative of the source's compliance with the permit. The following permit conditions include periodic monitoring requirements as well as previously defined periodic monitoring required in new source review permits.

The permit requires documentation of training provided to operators of Emission Units 00201, 00202, 00203, and 00204 and written operating procedures, inspection schedules and maintenance schedules for Emission Units 00201, 00202, 00203, and 00204.

The permit requires that each of the Emission Units 00201, 00202, 00203, and 00204 shall be equipped with monitoring devices that provide appropriate data to be used in calculating the work performed by each engine in units of horsepower-hours (hp-hrs) and a device to measure or calculate each engine's load in horsepower, hours of operation, and speed.

Periodic monitoring includes the collection of data to determine the emission rates of NO_x (measured as nitrogen dioxide (NO_2)), CO and O_2. Portable emission monitors are used to determine pollutant concentration in the gas stream. At a minimum, periodic monitoring of stack emissions shall be conducted once annually for each engine emission unit.

The following data shall be recorded during the stack emissions monitoring: an hourly average concentration of NO_x (measured as nitrogen dioxide (NO_2)), CO and O_2; work (hp-hr) performed by the engine during the test; calculated exhaust gas dry volume flow rate; and duration of the test. Using the data collected, emissions may be calculated in units of grams per brake horsepower-hour and pounds per hour for comparison with emission standards and hourly emission limits in conditions III.A.6 through III.A.8.

Source selected, DEQ approved portable measurement devices will be used to monitor NO_x (measured as nitrogen dioxide (NO_2)), CO and O_2 in the engine exhaust stacks. A test protocol for the initial periodic monitoring procedure will be submitted to the DEQ for approval. Subsequent changes to the protocol must be approved by the DEQ.

Periodic monitoring measurements will be taken at least once semi-annually. The permittee will select and conduct periodic monitoring on two emission units for a six-month period. During the next six-month period the permittee will conduct periodic monitoring on the remaining two emission units. Periodic monitoring will be applied to each Emission Unit a minimum of once each calendar year. The DEQ reserves the right to change the frequency of periodic monitoring emission tests.

Periodic monitoring for Emission Unit 00204 will consist of two measurements for NO_x emissions during a six-month period. At least one NO_x periodic monitoring measurement will be conducted while Emission Unit 00204 is operating in ambient up-rating mode (approaching 3712 hp). If Emission Unit 00204 does not operate in ambient up-rating mode during a calendar year, then a periodic monitoring measurement during ambient uprating of Emission Unit 00204 is not required that year. If ambient uprating of Emission Unit 00204 occurs in a calendar year, and a valid ambient uprating periodic monitoring measurement is not obtained in the calendar year, compliance with the annual average standard of performance for Emission Unit 00204 shall be calculated by substituting the maximum emission rate of 2.0 g NO_x/bhp-hr for the missing data point.

Carbon monoxide periodic monitoring serves as surrogate periodic monitoring for VOC, therefore periodic monitoring of VOC is not required. In fuel burning equipment, the change in the emission rate of VOC typically increases or decreases as CO emissions increase or decrease. Incomplete combustion of fuel increases emissions of CO and VOC. Proper operation of the engines results in complete combustion of fuel which decreases both CO and VOC emissions. As explained in Condition III.B.6.c, if periodic monitoring results indicate an exceedance of the CO emission standard and the exceedance cannot be corrected, the engine emission unit shall be tested for compliance with both the CO and the VOC emission standard.

The permit specifies the course of action to be taken when a periodic monitoring measurement, conducted in accordance with Condition III.B.5, results in a calculated emission rate in excess of the engine's emission standard or hourly emission limit. When an exceedance of the emission standard in grams/brakehorsepower-hours for NO_x or CO occurs, the source is required to apply corrective action to the affected engine. Following completion of corrective action, the source repeats the periodic monitoring method contained in Condition III.B.5 to demonstrate the exceedance has been corrected. If the exceedance has not been corrected, the permittee is required to conduct a stack test to determine compliance. Compliance test shall be conducted in accordance with 40 CFR 60, Appendix A methods or other methods as approved by the DEQ.

CO periodic monitoring is a surrogate measure of VOC emissions. The condition requires that engine emission units that are stack tested to determine compliance with CO emission limits shall also be stack tested to determine compliance with VOC emission limits.

The permit specifies the frequency and method to be used for maintenance and calibration of the periodic monitoring and parametric monitoring equipment.

The permittee shall maintain and calibrate the portable NO_x, CO and O_2 emissions monitoring test equipment in accordance with the manufacturer's specifications and recommended calibration frequency. The calibration specifications and calibration frequency may be changed upon request or approval of the DEQ.

Periodic monitoring of the opacity of each engine exhaust stack is required in the permit. Monitoring shall occur once each calendar week for a brief time to determine if normal visible emissions are present. Normal visible emissions for engines burning natural gas would be little (less than 5% opacity) or no visible emissions. The condition requires a Method 9 visible emissions test be conducted if the cause of excess visible emissions cannot be corrected. Excess opacity emissions, its cause, and corrective measures taken to eliminate excess opacity shall be documented.

Recording requirements include parametric measurements used to calculate hourly and annual emissions; summary of annual emissions calculated monthly as the sum of each consecutive twelve months; DEQ approved pollutant specific emission factors and equations used to calculate annual emissions; periodic monitoring results; and opacity monitoring results. The recordkeeping requirements contained in Condition 16 of the 04/29/97 Permit and Specific Condition 11 of the 05/25/90 Permit have been modified to meet Part 70 requirements.

Condition III.B.10 allows periodic monitoring data and calculated values which show an exceedance of applicable emission standards to be considered credible evidence of violation of the permit.

Testing

Condition III.C.1 requires that the permittee shall use test methods in accordance with procedures approved by the DEQ. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Condition III.B.6 specifies an emissions stack test shall be required when periodic monitoring of the engines indicates an uncorrectable emission limit exceedance is present.

Condition III.C.2 requires the use of portable emission monitors for periodic monitoring of stack emissions shall be conducted according to the procedures in Condition III.B.5.

The permit does not require source tests. The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

Condition III.D.1 requires the permitee to report emission exceedances of the applicable emissions standards, in accordance with Condition VII.E. Compliance tests results shall be provided to the Air Compliance Manager of DEQ within 30 days of conducting the test.

Condition III.D.2 requires that the permittee shall submit reports in accordance with permit conditions VII.C through VII.F.

Condition III.D.3 requires the permittee to maintain current emission data and upon request report process and production data, changes in control equipment, and operating schedules.

Additional reporting requirements are as specified in General Condition VII.C of the permit.

EMISSION UNIT APPLICABLE REQUIREMENTS – Auxiliary Generator Requirements (Emission Unit 002G1)

The auxiliary generator is classified as an insignificant unit under 9 VAC 5-80-720 C.4.d. since it is rated at 412.5 Hp maximum, which is sufficiently less than 840 HP threshold value. However, the auxiliary generator is limited by permit, dated April 29, 1997, with respect to non-emergency operating hours and is subject to opacity limitations. Therefore, permit limitations for the Auxiliary Generator (Emission Unit 002G1) are included in the draft Title V permit even though the emission unit is an insignificant activity.

Limitations

The following limitations are requirements from the Minor NSR Permit issued on April 29, 1997:

> *Condition 9,* allows natural gas to be burned in the auxiliary generator and requires operation only for providing power during interruption of service from the normal power supplier and allows operation of no more than 500 hours per year to demonstrate reliability.
>
> *Condition 20,* requires a maintenance schedule and maintenance records to be maintained.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

> *9 VAC 5-50-80,* New Source Standard for Visible Emissions
> Visible emissions shall not exceed 20 percent opacity except for one six-minute period of not more than 30 percent opacity.

Monitoring and Recordkeeping

The monitoring and recordkeeping requirements in the April 29, 1997, NSR permit have been modified to meet Part 70 requirements.

Condition IV.B.1 requires the source to monitor and record the number of hours of non-emergency operation of the auxiliary generator (Emission Unit 002G1), calculated monthly as the sum of each consecutive 12-month period. The auxiliary generator is operated occasionally to determine its readiness for emergency operation.

Secondly, the condition requires annual recordkeeping of hours of operation of the auxiliary generator (Emission Unit 002G1) as a result of interruption of service from the normal power

supplier. There are no emission limits associated with emergency operation of the unit, therefore, an annual sum of hours of operation are adequate for recordkeeping. The purpose of the monitoring is to demonstrate the emission unit is utilized for emergency situations and not for regular service, such as peak-shaving.

Additional periodic monitoring is not necessary since this emission unit is an insignificant emissions unit and the unit burns natural gas.

The NSR permit lacks opacity periodic monitoring for the auxiliary emergency generator (Emission Unit 002G1), therefore the permit requires in Condition IV.B.2 that the source monitor the exhaust stack of Emission Unit 002G1 for opacity emissions at least once semi-annually. An observation is not required if the emission unit does not operate during a semi-annual period. Periodic monitoring consists of briefly observing the exhaust stack for signs of normal visible emissions. If above normal visible emissions are present, the source is required to take corrective action or perform a 40 CFR 60, Appendix A, Method 9 visible emissions evaluation. The source shall record the date and results of each periodic monitoring observation or Method 9 evaluation.

Testing

Condition IV.C.1 requires that upon request, test ports shall be provided on the auxiliary generator exhaust stack (Stack ID G1) to allow for emissions testing.

The permit does not require source tests. The Department and EPA have authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

Reporting

Condition IV.D.1 requires the permitee to report emission exceedances of applicable emissions standards, in accordance with Condition VII.E. Compliance tests results shall be provided to the Air Compliance Manager of DEQ within 30 days of conducting the test.

Condition IV.D.2 specifies the permittee shall submit reports in accordance with permit conditions VII.C through VII.F.

Condition IV.D.3 requires the permittee to maintain current emissions data and upon request report process and production data, changes in control equipment, and operating schedules.

Additional reporting requirements are as specified in General Condition VII.C of the permit.

Streamlined Requirements

The following conditions in the April 29, 1997 NSR permit have not been included in the Title V permit for the reasons provided.

Condition 1:
The source has been constructed and is already operating under the conditions of the new source review permit. The Title V permit has its own regulatory requirement (9 VAC 5-80-50) which requires the source to obtain an operating permit. Condition 1 has been streamlined from the permit since the basis of the Title V permit is the Title V permit application.

Condition 2:
The equipment specified in Condition 2 has already been constructed. The equipment to be operated is also identified in the Title V permit application. The requirements of this condition have been met; therefore the condition is streamlined from the draft permit.

Condition 10 and 11:
The formaldehyde limitation in Condition 10 has been rescinded effective August 2002 and is streamlined from the draft permit. (See Appendix D - Letter from DEQ, dated August 23, 2002, rescinding conditions.)

Condition 11 of the April 29, 1997 permit has been rescinded effective August 2002 and is streamlined from the draft permit. (See Appendix D - Letter from DEQ, dated August 23, 2002, rescinding conditions.)

Justification for the rescission of formaldehyde limitations is contained in 9 Virginia Administrative Code (VAC) 5-60-300.C.4 and C.5 of 9 VAC 5 Chapter 60 Part II Article 5, Emission Standards for Toxic Pollutants from New and Modified Sources (Rule 6-5). 9 VAC 5-60-300.C.4 states that Article 5 (Rule 6-5) shall not apply to a stationary source in a source category that is regulated by an emission standard or other requirement pursuant to §112 of the federal Clean Air Act and subject to a source category schedule for standards. The source is subject to the source category schedule for standards (40 CFR Part 63, Subpart ZZZZ, Stationary Reciprocating Internal Combustion Engines MACT Standards) established pursuant to §112(d) of the federal Clean Air Act. Therefore, 9 VAC 5 Chapter 60, Part, II Article 5 (Rule 6-5) does not apply to this source.

Condition 13 and 14:
The source has successfully completed the requirements of Condition 13 which requires the source to conduct stack testing for NO_2 emissions from Emission Unit 00204. The source has successfully completed the requirements of Condition 14 which requires the source to conduct a visible emissions evaluation on the stack associated with Emission Unit 00204.

The requirements of these conditions have been met (testing was conducted on April 7, 1998) therefore Conditions 13 and 14 are streamlined from the draft permit.

Condition 15:
Emission Unit 00204 has been constructed, commenced operation (notification on October 27, 1997), and has been emissions tested (on April 7, 1998). The requirements of the condition have been met therefore Condition 15 is streamlined from the draft permit.

Condition 21:
The source has been constructed. The condition has been satisfied and the requirement is streamlined from the draft permit.

The following conditions in the May 25, 1990 permit have been streamlined in the Title V permit process.

Specific Condition 1:
Condition 1 specifies the name of the source and its location. There is no regulatory citation for this condition in the new source review permit. The condition is streamlined from the draft permit.

Specific Condition 2:
The source has been constructed and is already operating under the conditions of the new source review permit. The Title V permit has its own regulatory requirement (9 VAC 5-80-50) that requires the source to obtain an operating permit. Condition 2 has been streamlined from the permit since the basis of the Title V permit is the Title V permit application.

Specific Condition 3:
The equipment specified in Condition 3 has already been constructed. The equipment to be operated is also identified in the Title V permit application. The requirements of this condition have been met therefore the condition is streamlined from the draft permit.

Specific Condition 8:
The source has successfully completed the requirements of Condition 8 which requires the source to conduct stack testing for NO_2, CO and VOC on one of the emission units. Testing was conducted on Emission Unit 00201 on February 19, 1991. The requirements of this condition have been met therefore the condition is streamlined from the draft permit.

General Condition 1:
The source has satisfied the requirements to notify the DEQ of dates of construction (June 21, 1990), anticipated start-up (December 13, 1990) and actual start-up (December 4, 1990), and emissions testing of Emission Units 00201 through 00203 (February 19, 1991). The condition is streamlined from the draft permit.

General Condition 2:
The source has satisfied the requirement to stack test one of the three Emission Units 00201 through 00203. The source tested emission unit 00201 on May 7, 1991. The condition is streamlined from the draft permit.

General Condition 3:
The engines have been constructed for emissions testing. Emissions testing has been conducted on Emissions Units 00201 (February 19, 1991) and 00204 (April 7, 1998). The requirement is streamlined from the draft permit.

General Condition 4:
This condition requires the source to retain records of all emission data and operating parameters. Sections III.B, IV.B, and General Condition C in the draft Title V permit contain recordkeeping requirements related to emissions data and operating parameters. These conditions include the recordkeeping requirements identified in General Condition 4; therefore the requirement in General Condition 4 is streamlined from the draft permit.

General Condition 5:
Condition III.B.9 of the draft permit requires the source to develop a maintenance schedule and maintain records of maintenance. There are no add on control devices at this facility. General Condition 5 is streamlined from the draft permit.

General Condition 9:
The source has been constructed. The condition has been satisfied and the requirement is streamlined from the draft permit.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

Comments on General Conditions

The following changes have been made to the existing Title V permit per the updated boilerplate (November 17, 2006):

Permit Modification, Condition J replaced the Permit Action for Cause condition.

Malfunction as an Affirmative Defense, Condition U was restructured.

Asbestos Requirements, Condition Y was added.

STATE ONLY APPLICABLE REQUIREMENTS

None were identified by the facility.

FUTURE APPLICABLE REQUIREMENTS

None were identified by the facility.

INAPPLICABLE REQUIREMENTS

40 CFR 64, the Compliance Assurance Monitoring (CAM) rule does not currently apply to Bickers Compressor Station. CAM applies to pollutant-specific emission units with pre-control device emissions of regulated pollutants exceeding major source thresholds. The units must have control devices in place and applicable requirements for the subject pollutant. The rule requires sources to monitor the operation and maintenance of the control devices to ensure compliance with applicable requirements. The Bickers Compressor Station does not have any controls on its emission units. Therefore, the Compliance Assurance Monitoring Rules do not apply.

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
BLR1	Boiler #1, Heating System Boiler (natural gas-fired)	9 VAC 5-80-720 C	NO_x, CO, SO_2, PM-10, formaldehyde	2.1 MMBtu/hr
HTR1	Heater #1, Line Heater (natural gas-fired)	9 VAC 5-80-720 C	NO_x, CO, SO_2, PM-10, formaldehyde	4.0 MMBtu/hr
G2	Generator #002G2	9 VAC 5-80-720 C	NO_x, CO, SO_2, PM-10, formaldehyde	82 hp
A01	Lube Oil Tank	9 VAC 5-80-720 B	VOC	8,000 gallons
A02	Used Oil Tank	9 VAC 5-80-720 B	VOC	8,000 gallons
A03	Glycol Tank	9 VAC 5-80-720 B	VOC	8,000 gallons
A04	Water Mixture Tank (Glycol/Water Mixture)	9 VAC 5-80-720 B	VOC	8,000 gallons

A05	Water Mixture Tank (Waste Water)	9 VAC 5-80-720 B	VOC	8,000 gallons
A06	Pipeline Liquids Tank	9 VAC 5-80-720 B	VOC	8,000 gallons
A07	Gasoline Tank	9 VAC 5-80-720 B	VOC	600 gallons/hr
A08	Diesel Fuel Tank	9 VAC 5-80-720 B	VOC	400 gallons
BWIS	Wastewater Evaporator #1 WE1	9 VAC 5-80-720 B	VOC, PM-10	900 gallons

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

The proposed permit will be placed on public notice in *The Greene County Record* from September 26, 2007 to October 27, 2007.

ATTACHMENTS

A. 2006 Emission Inventory
B. Minor NSR Permit (dated May 25, 1990)
C. Minor NSR Permit (dated April 29, 1997)
D. State Toxics Condition Rescission Letter Dated August 23, 2002
E. Emission Calculations